

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)	Chapter 7
)	
Lakesha R. Steward,)	Case No. 22-14986
)	
Debtor.)	Hon. A. Benjamin Goldgar

**OBJECTION IN OPPOSITION TO TRUSTEE’S MOTION TO EXTEND
TIME TO FILE COMPLAINTS UNDER SECTION 727**

Now comes Lakesha R. Steward, Debtor, by and through her attorneys Gregory K. Stern, Monica C. O’Brien and Rachel S. Sandler and for her Objection to the Trustee’s Motion to Extend Time to File Complaints Under Section 727, states as follows:

1. The Debtor opposes the Trustee’s Motion to Extend Time to file Complaints Under Section 727 because it fails to set forth any “cause” to support the requested extension.
2. The Debtor’s initial meeting of creditors was scheduled for February 1, 2023, at which time the Debtor appeared and was examined by the Trustee. The Trustee did not request any additional documentation or information from the Debtor during or after the initial meeting of creditors. Notwithstanding, the meeting was continued until to April 25, 2023.
3. On April 10, 2023, over the Debtor’s objection, the Court granted the Trustee’s First Motion to Extend Time to file Complaints Under Section 727 (the “First Motion to Extend”). The First Motion to Extend Time did not allege any facts or information as to the basis of the extension request which was granted as “routine.”
4. On or about April 13, 2023, prior to the continued meeting of creditors scheduled for April 25, 2023, the Debtor sought to determine if her presence or additional documentation or information was needed. The Trustee confirmed that the Debtor’s attendance was not necessary, and again did not request any additional documentation or information. See email exchange with the Trustee and

her counsel attached hereto as Exhibit A and incorporated herein.

5. Other than the initial documentation supplied in advance of the initial meeting of creditors (i.e. tax returns, pay advices, identification and proof of social security, etc.) the Trustee has not requested any information or documentation from the Debtor.

6. On June 30, 2023, the Trustee filed her Second Motion to Extend Time to file Complaints Under Section 727 (the “Second Motion to Extend”) and again has provided the court with no basis for any extension. The Trustee does not allege that the Debtor failed to provide her with information or documentation; or challenge the accuracy or veracity of the information disclosed in the Schedules or Statement of Financial Affairs filed in this case.

7. The Trustee does not allege any facts or behavior of the Debtor that would give rise to a cause of action under 727; and, any further extension the 727 deadline is not warranted in this case. To continue to allow the Trustee to extend the 727 deadline without any basis in fact or law unfairly prejudices the Debtor who is deserving of a discharge.

WHEREFORE, Lakesha R. Steward, prays that this Court enter an order denying the Trustee’s Motion to Extend Time to File Complaints Under Section 727 and for such other relief as this Court deems just.

/s/ Gregory K. Stern
Gregory K. Stern, Debtor’s Attorney

Gregory K. Stern (Atty. ID #6183380)
Monica C. O’Brien (Atty. ID #6216626)
Rachel S. Sandler (Atty. ID #6310248)
53 West Jackson Boulevard
Suite 1442
Chicago, Illinois 60604
(312) 427-1558



Rachel Sandler <rachel@gregstern.com>

Lekesha Steward, Case No. 22 - 14986

2 messages

Rachel Sandler <rachel@gregstern.com>

Thu, Apr 13, 2023 at 1:40 PM

To: Deborah Kanner Ebner <dkebnr@deborahnebnerlaw.com>, Ariane Holtschlag <aholtschlag@wfactorlaw.com>

Hi Debbie and Ariane,

Please confirm whether the Debtor's attendance at the continued 341 on April 25th is needed. Additionally, let me know if the Trustee is requesting any documents from the Debtor.

Thanks.

Rachel Sandler

Gregory K. Stern, P.C.

53 West Jackson Boulevard, Suite 1442

Chicago, Illinois 60604

(312) 427-1558

(312) 427-1289 (facsimile)

Deborah Kanner Ebner <dkebnr@deborahnebnerlaw.com>

Thu, Apr 13, 2023 at 1:45 PM

To: Rachel Sandler <rachel@gregstern.com>, Ariane Holtschlag <aholtschlag@wfactorlaw.com>

Attendance is not needed. Ariane will address doc production from your client.

From: Rachel Sandler <rachel@gregstern.com>

Sent: Thursday, April 13, 2023 1:40 PM

To: Deborah Kanner Ebner <dkebnr@deborahnebnerlaw.com>; Ariane Holtschlag <aholtschlag@wfactorlaw.com>

Subject: Lekesha Steward, Case No. 22 - 14986

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Thanks.

Rachel Sandler

Gregory K. Stern, P.C.

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Ex A.